

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Search Warrant Dated
November 5, 2021

Case No.: 21 Misc. 813 (AT)

In re Search Warrant Dated
November 3, 2021

Case No.: 21 Misc. 819 (AT)

In re Search Warrant Dated
November 3, 2021

Case No.: 21 Misc. 825 (AT)

**PETITIONERS' MOTION FOR
LEAVE TO FILE UNDER SEAL**

BARR & KLEIN PLLC
Benjamin Barr (admitted *pro hac vice*)
444 N. Michigan Ave., Ste. 1200
Chicago, IL 60611
202-595-4671
ben@barrklein.com

Stephen R. Klein (admitted *pro hac vice*)
1629 K Street NW Ste. 300
Washington, D.C. 20006
202-804-6676
steve@barrklein.com

*Counsel for Project Veritas and
James O'Keefe*

GRAVES GARRETT LLC
Edward D. Greim
Todd P. Graves (admitted *pro hac vice*)
Graves Garrett, L.L.C.
1100 Main Street St. 2700
Kansas City, MO 64105
(816) 256-4144
edgreim@gravesgarrett.com

SCHAERR | JAFFE LLP
Erik S. Jaffe
1717 K Street NW, St. 900
Washington, DC 20006
(202) 787-1060
ejaffe@schaerr-jaffe.com
Counsel for Project Veritas

Jeffrey H. Lichtman
Law Offices of Jeffrey Lichtman
11 E. 44th St., Suite 5011
New York, New York 10017
212-581-1001
jl@jeffreylightman.com

Marc A. Fernich
Law Office of Marc Fernich
800 Third Avenue, Suite 18
New York, New York 10022
212-446-2346
maf@fernichlaw.com

Counsel for James O'Keefe

THE DICKERSON LAW GROUP, P.A.
Brian E. Dickerson
6846 Trail Boulevard
Naples, FL 34108
202-570-0248
bdickerson@dickerson-law.com

Eric Franz
The Law Offices of Eric Franz, PLLC
One Old Country Road, Suite 347
Carle Place, New York 11514
212-355-2200
eric@efranzlaw.com

Counsel for Spencer Meads

GREENBERG TRAURIG LLP
Adam S. Hoffinger
Steven Harrison
2101 L Street N.W., Suite 1000
Washington, D.C., 20037
202-331-3173
hofferlinga@gtlaw.com

Counsel for Eric Cochran

PETITIONER'S MOTION FOR LEAVE
TO FILE UNDER SEAL

On behalf of all Petitioners, Petitioner Project Veritas respectfully moves for leave to file under seal, pursuant to Rule IV(A) of the Court's Individual Practice Rules, Petitioners' Reply to its Non-Public Objections to the Special Master's Report and Recommendation. The Non-Public Reply discusses specific documents addressed by the Report and Recommendation that have not

been disclosed to the Government's Investigative Team due to claims of privilege under the First Amendment, the Journalistic Privilege and Attorney-Client Privilege. Petitioners' Public Reply will be publicly filed and discuss the law and facts without revealing the contents of documents for which privilege is in dispute.

In accordance with this Court's Rule, Petitioner Project Veritas, Inc., therefore, seeks on its own behalf and on behalf of all Petitioners leave to submit the Non-Public Reply in Support of Petitioners' Objections to the Special Master's Report and Recommendation under seal.

Dated: June 23, 2023

Respectfully submitted,

/s/ Edward D. Greim
Edward D. Greim #4240172
Graves Garrett LLC
1100 Main Street, Suite 2700
Kansas City, MO 54105
(816) 256-3138
edgreim@gravesgarrett.com

Counsel for Petitioners

CERTIFICATE OF SERVICE

This certifies that the foregoing was served via the Court's Electronic Case Filing System on the date of filing, June 23, 2023, to all counsel of record.

s/ Edward D. Greim
Attorneys for Petitioners